

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	NO. 20-mj-2336
	)	JUDGE FRENSLEY
CALEB D. JORDAN	)	
	)	

MOTION TO SEAL

The United States of America, by and through S. Carran Daughtrey, Assistant United States Attorney for the Middle District of Tennessee, respectfully requests this Court seal the complaint and warrant in the above-captioned matter (with disclosure permitted to defendant's counsel pursuant to an early disclosure agreement, Fed.R.Crim.P. 16), because the whereabouts of the defendant are unknown and there is an ongoing criminal investigation.

The United States also requests this Court seal the affidavit filed in support of the complaint, which contains information concerning the sexual exploitation of minor(s). Title 18, United States Code, Section 3509(d) sets forth various privacy protection requirements that apply, inter alia, to employees of the government, employees of the Court, defendants, defense attorneys, and others hired by the United States and the defense to assist in the proceedings. See 18 U.S.C. § 3509(d)(1). The affidavit in this case sets forth certain information that could lead to the identification of minor victim(s) and therefore disclosure of the affidavit could jeopardize the privacy interests of minor victim(s).

Papers filed in Court that disclose the name "or any other information concerning a child" are to be filed under seal without necessity of obtaining a court order. See 18 U.S.C. 3509(d)(2). In an abundance of caution, however, the United States is seeking this order to seal to ensure the

document remains under seal.

For the reasons set forth above, the United States respectfully moves the Court to seal the affidavit filed in support of the criminal complaint and seal the arrest warrant and until it has been served.

Respectfully submitted,

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Middle District of Tennessee

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